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**From:** Elston, Sue [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1DBE9F771E794AA4B66CACEC681E07E8-SELSTON]  
**Sent:** 7/13/2016 1:48:53 PM  
**To:** Schense, Pamela J - DNR [Pamela.Schense@wisconsin.gov]; Hauser, Kerrie J MVP (Kerrie.J.Hauser@usace.army.mil) (Kerrie.J.Hauser@usace.army.mil) [Kerrie.J.Hauser@usace.army.mil]; Trochlell, Patricia A - DNR [Patricia.Trochlell@wisconsin.gov]  
**Subject:** RE: Big Hollow Wetland Mitigation Bank Prospectus - DNR Comments

Kerrie, I know I said I would have comments to you on this bank by July 8. I did not make that date. Since I was not able to make the site visit and I see from Pam's comments that some additional information has been provided on this bank site. So, I am going to wait until the additional information is provided to the IRT before I comment on this bank proposal.

Sue

*Sue Elston*

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**From:** Schense, Pamela J - DNR [mailto:Pamela.Schense@wisconsin.gov]  
**Sent:** Monday, July 11, 2016 7:47 AM  
**To:** Hauser, Kerrie J MVP (Kerrie.J.Hauser@usace.army.mil) (Kerrie.J.Hauser@usace.army.mil) <Kerrie.J.Hauser@usace.army.mil>; Elston, Sue <elston.sue@epa.gov>; Trochlell, Patricia A - DNR <Patricia.Trochlell@wisconsin.gov>  
**Subject:** Big Hollow Wetland Mitigation Bank Prospectus - DNR Comments

Kerrie,

The DNR has completed its review of the prospectus for the Big Hollow Wetland Mitigation Bank. Based on the prospectus, the revised concept plan memo dated June 16, 2016 and the recent site visit, DNR does feel this site has potential to be a successful wetland mitigation bank. Many of the specific details of the plan will not be known until the sponsor finishes the topographic study and hydrology modeling so we anticipate more comments once that information has been provided to the IRT. Our specific comments are as follows:

- The prospectus did not include a map showing the locations of the proposed wetland types and buffers. It is unknown at this time if the location and extent of the proposed buffer is adequate.
- There aren't specifics details about how hydrology will be restored and it only includes what may be done (berms, scraping, ditch removal). It is understood that the plan will be finalized based on the results of the hydrology modeling being done and the topographic data collection. DNR will likely have additional comments on the design once this plan has been prepared.
- DNR is pleased to see that the proposed wetland types of fresh wet meadow and sedge meadow were modified to wet prairie and sedge meadow in the June 14, 2016 revised concept plan memo. The amount of shallow marsh should be minimized as much as possible, if not eliminated, as it is not a preferred mitigation wetland type.
- The prospectus mentions an easement for the regional drainage ditch and stormwater detention basin. Are any of the lands under this easement located within the bank boundary? Will the maintenance of these features affect the bank site?
- Table 1. Proposed Credits – Enhancement of sedge meadow may not warrant a 0.75:1 ratio. The ratio will be determined based on the amount of functional lift achieved in this area and if the enhancement

is only vegetative or if there will also be hydrologic enhancement. Also, stormwater management features are not eligible for mitigation credits.

- The prospectus mentions that traditional hydrology performance standards may not fit this site. Is there a nearby reference wetland with similar conditions that could be used to establish appropriate hydrology standards? Data would need to be collected in a reference wetland to document it is appropriate and use of that wetland would need to be approved by the IRT.
- Figure 9 does not indicate the ground surface elevation so it is unclear how far below the surface groundwater was detected.
- The issue related to the bank and its proximity to the nearby airport will need to be cleared.
- The prospectus does not provide information regarding proposing plantings, monitoring plan, maintenance plan (including invasive, non-native treatment plan), performance standards, monitoring report requirements, etc. and does not mention the need for financial assurances. Although not required in the prospectus it would be helpful to have those items to provide feedback to the sponsor.

If you have any questions, please let me know.

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Pam Schense

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